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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
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11 MORADA MUSIC, LLC, a California)	Case No. CV11-07676 MMM (MANx)
12 limited liability company,)	
13 Plaintiff,)	STIPULATION PROVIDING FOR ENTRY
14)	OF A FINAL ORDER RESOLVING ALL
15 v.)	MATTERS IN THIS CASE
16 JAMIE TATE, an Individual,)	
17 Defendant.)	
18 _____)	

19 The parties, plaintiff, Morada Music LLC, by and through
20 its counsel, Allen Hyman, and Jamie Tate, in pro se, represent to
21 the Court and Stipulate as follows:

- 22 1. On September 16, 2011, plaintiff Morada Music LLC
23 ("MORADA") filed its complaint against Jamie Tate ("TATE"), which
24 action is before this Court.
- 25 2. On September 21, 2011, MORADA served defendant Jamie
26 Tate.
- 27 3. On September 26, 2011, MORADA filed a proof of
28 service as to defendant TATE.

STIPULATION FOR ENTRY OF FINAL ORDER

1 4. On October 24, 2011, MORADA, and TATE, submitted a
2 stipulation providing for an Order by which defendant TATE would
3 have up to, and including November 7, 2011 to file a response to
4 MORADA's September 16, 2011, complaint.

5 5. MORADA, on the one hand, and TATE, on the other,
6 represent to the Court that they have entered into a Settlement
7 Agreement ("SA") that resolves all matters between them.

8 6. MORADA on the one hand, and TATE on the other,
9 present to the Court, attached as Exhibit No. 1 to this
10 Stipulation, a proposed order which provides: (a) for a permanent
11 injunction as to defendant TATE; (b) for the Court to retain
12 jurisdiction to interpret and enforce the settlement agreement
13 between MORADA and TATE; and (c) for dismissal of the MORADA
14 complaint with prejudice with each party to bear their own costs
15 and attorneys fees.

16 7. Plaintiff MORADA and defendant TATE, respectfully
17 request that the Court enter the (Proposed) Order attached as
18 Exhibit No. 1, as a final resolution of this matter.

19 8. The parties respectfully represent to the Court that
20 the entry of the Court Order is a condition precedent to the
21 effectuation of the SA as between them.

22 9. The parties are mindful that even with regard to
23 stipulation providing for entry of an Order, that the determination

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STIPULATION FOR ENTRY OF FINAL ORDER

1 of the Court to accept the Order rests with the discretion of the
2 Court.

3 LAW OFFICES OF ALLEN HYMAN

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5 Dated: Nov. 2, 2011

By: 

Allen Hyman, Esq.
Attorneys for Plaintiff MORADA
MUSIC, LLC

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8 Dated: Nov 1, 2011


JAMIE TATE
In pro se

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STIPULATION FOR ENTRY OF FINAL ORDER

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State to the within action. My business address is 10737 Riverside Drive, North Hollywood, California 91602. of California. I am over the age of 18 and not a party

On November 2, 2011, I served the foregoing document described as **STIPULATION PROVIDING FOR ENTRY OF A FINAL ORDER RESOLVING ALL MATTERS IN THIS CASE; (PROPOSED) FINAL ORDER PROVIDING FOR A PERMANENT INJUNCTION; AND A FINAL RESOLUTION OF THIS CASE** the parties in this action by placing a copy thereof enclosed in a sealed envelope addressed as follows:

Jamie Tate
2741 Larmon Dr.
Nashville, TN 37204

[X] (BY MAIL) to the addressees as indicated on the attached Service List, as follows: I am "readily familiar" with the firm's practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at North Hollywood, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

[] (BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the addressee as indicated on the attached service list.

[] (BY FACSIMILE) I sent such document via facsimile to the offices of the addressees as indicated on the attached service list.

[] (BY OVERNIGHT MAIL SERVICE) I caused such document to be delivered via Overnight Mail to the addressees as indicated on the attached service list.

[X] (**FEDERAL**) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on November 2, 2011, at North Hollywood, California.

/s/ Allen Hyman
Allen Hyman